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8 **UNITED STATES BANKRUPTCY COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

10 In re } Bankruptcy Case No. 10-64039
 11 JAMES GIBBS, } Docket Control No. ETL-1
 12 Debtor. } Chapter 7

13 JPMORGAN CHASE BANK, }
 14 NATIONAL ASSOCIATION, and its } [Filed pursuant to Local Bankruptcy Rule
 successors and/or assignees, } 9014-1(f)(2)]

15 Movant, }
 16 vs. } **HEARING DATE:**
 17 JAMES GIBBS, Debtor, and SHERYL } DATE: March 1, 2011
 STRAIN, Trustee, } TIME: 1:30 p.m.
 18 Respondents. } CTRM: 11

21 **JPMORGAN CHASE BANK, NATIONAL ASSOCIATION'S NOTICE OF MOTION FOR**
 22 **RELIEF FROM AUTOMATIC STAY ON REAL PROPERTY (35572 TULE RIVER**
 23 **DRIVE, SPRINGVILLE, CA 93265)**

24 **TO THE HONORABLE WHITNEY RIMEL, UNITED STATES BANKRUPTCY COURT**
 25 **JUDGE, THE DEBTOR, THE DEBTOR'S COUNSEL, THE TRUSTEE AND OTHER**
 26 **INTERESTED PARTIES:**

27 **PLEASE TAKE NOTICE** that JPMORGAN CHASE BANK, NATIONAL
 28 ASSOCIATION, and its successors and/or assignees ("JPMORGAN CHASE BANK,

1 NATIONAL ASSOCIATION”), has filed the attached Motion For Relief From The Automatic
2 Stay (the “Motion”) in the above-entitled and numbered Chapter 7 case. The Motion will be heard
3 before the Honorable WHITNEY RIMEL on March 1, 2011 at 1:30 p.m., in Courtroom 11, at the
4 United States Bankruptcy Court located at 2500 Tulare Street, Fresno, California.

5 The Motion is based upon the attached Declaration, Movant’s Relief from Stay
6 Information Sheet, and the Memorandum of Points and Authorities attached hereto, as well as
7 upon the documents filed in support of the Motion.

8 This Motion is being filed pursuant to Local Bankruptcy Rule 9014-1(f)(2) - which
9 provides that “the moving party may file and serve the motion at least fourteen (14) calendar days
10 prior to the hearing date. The use of this alternative procedure in connection with a motion for
11 relief from the automatic stay shall be deemed a waiver of the time limitations contained in 11
12 U.S.C. §362(e). Furthermore, when fewer than twenty-eight (28) calendar days’ notice of a
13 hearing is given, no party in interest shall be required to file a written opposition to the motion.
14 Opposition, if any, shall be presented at the hearing on the motion. If opposition is presented, or if
15 there is other good cause, the Court may continue the hearing to permit the filing of evidence and
16 briefs.”

17 DATED: February 2, 2011

Respectfully Submitted,

18 MALCOLM ♦ CISNEROS, A Law Corporation

19 By: /s/ Erica T. Loftis
20 ERICA T. LOFTIS
21 Attorneys for Movant

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